

# EXHIBIT 61

Dr. Emily Scordellis

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHARLES JOSEPH FREITAG, JR., as: No.: 2:19-cv-05750-JMG  
ADMINISTRATOR of the ESTATE :  
of CHARLES JOSEPH FREITAG, SR., :

Plaintiff :

v. :

Bucks COUNTY; PRIMECARE MEDICAL: CIVIL ACTION - LAW  
INC.; STEPHAN BRAUTIGAM, PMHNP; :  
JESSICA MAHONEY, PSY.D.; AVIA :  
JAMES, LPC; CHRISTINA PENGE, :  
LPC; CORRECTIONAL OFFICER :  
MOODY; CORRECTIONAL OFFICER :  
MURPHY; and CORRECTIONAL : JUDGE JOHN M. GALLAGHER  
OFFICER YOUNG, :

Defendants :

ZOOM DEPOSITION OF EMILY SCORDELLIS, Psy.D.

DATE AND TIME: Friday, May 7, 2021  
at 10:43 a.m.

KAPLAN LEAMAN & WOLFE  
COURT REPORTING & LITIGATION SUPPORT  
230 SOUTH BROAD STREET, SUITE 1303  
PHILADELPHIA, PENNSYLVANIA 19102  
424 Fleming Pike, Hammonton, New Jersey 08037  
(215) 922-7112 1-877-KLW-DEPO  
www.klwreporters.com

WWW.KLWREPORTERS.COM

JA0000788

Dr. Emily Scordellis

Page 55

1           That Level 3 watch was instituted as a  
2   result of an e-mail chain, which I'm showing you now,  
3   Exhibit P-1, between Deputy Warden Clifton Mitchell  
4   and Case Management Supervisor Carl Metellus?

5       A.    Okay.

6       Q.    All right. Have you seen this document  
7   before?

8       A.    I have not.

9       Q.    Okay. Well, then let me back up. I'll  
10   show -- look at the time frame, August 24th, 4:11  
11   p.m.

12           We know Mr. Freitag is back from court after  
13   receiving, down at the bottom of the form, a sentence  
14   of six to 12 years for AA, means aggravated assault.

15           Do you understand what I've just shown you  
16   here?

17       A.    Yes.

18       Q.    All right. As a result of this e-mail  
19   communication, Mr. Metellus indicates that he's  
20   implemented a Level 3 alert.

21           Do you see that?

22       A.    Yes.

23       Q.    Meaning Level 3 watch. Agreed?

24       A.    Agreed.

25       Q.    And that's consistent with what you learned